UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

AMERICAN BROADCASTING
COMPANIES, INC., DISNEY
ENTERPRISES, INC., TWENTIETH
CENTURY FOX FILM CORPORATION,
CBS BROADCASTING INC., CBS STUDIOS
INC., FOX TELEVISION STATIONS, LLC,
FOX BROADCASTING COMPANY, LLC,
NBCUNIVERSAL MEDIA, LLC,
UNIVERSAL TELEVISION LLC, and OPEN
4 BUSINESS PRODUCTIONS, LLC,

Plaintiffs and Counterclaim-Defendants,

v.

DAVID R. GOODFRIEND and SPORTS FANS COALITION NY, INC.,

Defendants and Counterclaim-Plaintiffs.

Case No.: 19-cv-7136-LLS

ORAL ARGUMENT REQUESTED

NOTICE OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Rule 56.1 Statement of Material Facts, the Declaration of David R. Goodfriend, and the Declaration of Laura B. Najemy and the exhibits attached thereto, Defendants David R. Goodfriend ("Goodfriend") and Sports Fans Coalition NY, Inc. ("SFCNY") (together "Defendants"), by and through their undersigned attorneys, hereby move this Court, before the Honorable Louis L. Stanton, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 1007, for an Order granting Defendants' motion for summary judgment, pursuant to Federal Rule of Civil Procedure 56(a), and dismissing Plaintiffs' claims.

Dated: May 6, 2021 Respectfully submitted,

/s/ R. David Hosp

R. David Hosp
Mark S. Puzella (admitted pro hac vice)
Sheryl Koval Garko (admitted pro hac vice)
Caroline K. Simons
Laura B. Najemy (admitted pro hac vice)
ORRICK, HERRINGTON & SUTCLIFFE LLP
222 Berkeley Street, Suite 2000
Boston, MA 02116
Tel: (617) 880-1800
dhosp@orrick.com
mpuzella@orrick.com
sgarko@orrick.com
csimons@orrick.com
lnajemy@orrick.com

Mitchell L. Stoltz ELECTRONIC FRONTIER FOUNDATION 815 Eddy Street San Francisco, CA 94109 Tel: (415) 436-9333 mitch@eff.org

Elizabeth E. Brenckman Lindsay Rindskopf ORRICK, HERRINGTON & SUTCLIFFE LLP 51 West 52nd Street New York, NY 10019-6142 Tel: (212) 506-5000 ebrenckman@orrick.com lrindskopf@orrick.com

Shane D. Anderson (admitted pro hac vice)
ORRICK, HERRINGTON & SUTCLIFFE LLP
777 South Figueroa Street, Suite 3200
Los Angeles, CA 90017
Tel: (213) 629-2020
sanderson@orrick.com

Erin M.B. Leach (admitted pro hac vice) ORRICK, HERRINGTON & SUTCLIFFE LLP 2050 Main St. Suite 1100 Irvine, CA 92614

Tel: (949) 567-6700 eleach@orrick.com

Counsel for Defendants and Counterclaim-Plaintiffs David R. Goodfriend and Sports Fans Coalition NY, Inc.